

UNITED STATES FEDERAL COURT FILED
FOR THE DISTRICT OF MASSACHUSETTS
CLERK'S OFFICE

IN RE:

BISASOR, ET AL

2016 JAN 22 PM 3 43

U.S. Bankruptcy Appeal COURT
Case No. 15-cv-13813-LTS.

REQUEST TO EXTEND TRACKING SCHEDULES FOR APPEALS

I, Andre Bisasor, hereby request an extension of time on any and all tracking deadlines and schedules pertaining to my appeal cases. In support, I state the following:

- a. I was blindsided by Mr. Baker's recent filing of a motion to withdraw and need time to put together a proper and effective response.
- b. I have asked the court for time to do so in prior motion, which is still pending.
- c. The matter of his withdrawal motion is still pending. Until the matter is ruled upon by this court, he is still my attorney in this matter. Yet he appears to have not attended to ensuring that the schedule is adhered to. I had previously believed that he was taking care of my appeals but in fact now have found out that he may have not been so by way of his blindsiding withdrawal motion with no warning at all.
- d. Mr. Baker has not informed me as to what deadlines there are on my appeals case. He had previously led me to believe that he was on top of my case. Yet he has completely abandoned me, leaving me uninformed of where things stand and subjecting my legal position to be destroyed due to his neglect and lack of diligent representation.
- e. I need time to figure out what I need to do and to get legal advice if he is allowed to withdraw.
- f. If he is not allowed to withdraw, then Mr. Baker will need to be sanctioned or otherwise instructed to meet all deadlines in accordance with proper and diligent representation requirements as outlined by the rules of professional conduct.
- g. If possible, I would like to request a hearing on this matter so that both Mr. Baker and myself can present factual arguments so that the court can be in a better position to make a decision.
- h. Because I have to do this by myself on a pro se basis at this juncture, I need time to catch up on all that Mr. Baker has not done in my case.
- i. [NB: I am de facto operating pro se at this juncture until the ruling of this court clarifies the matter, and so it is my understanding that all my statements and requests should be construed liberally and interpreted in a light most favorable.]

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully Submitted,
The Appellant,

Andre Bisasor
Andre Bisasor
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Dated: January 20, 2016